

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Defendants.

(Title vested in the name of
Tamra Paranteau)

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101-1271
(206) 553-7970

1 Tamra Paranteau and Claimant William Paranteau by and through their respective
2 undersigned counsel, hereby stipulate and agree to the Interlocutory Sale of the real
3 property located at 1507 NE 341st Avenue, Washougal, Washington (hereinafter
4 “defendant real property”), as follows:

5 1. This is a civil case, wherein the above identified property has been named
6 as a defendant asset in a civil forfeiture action, seeking forfeiture pursuant to Title 21,
7 United States Code, Section 881(a)(6), as proceeds of alleged violations of Title 21,
8 United States Code, Section 841(a)(1), and pursuant to Title 18, United States Code,
9 Section 981(a)(1)(A), as property involved in money laundering transactions, or property
10 traceable to such property, in violation of Title 18, United States Code, Section
11 1956(a)(1)(B)(i). The property has also been included in the Criminal Forfeiture
12 Allegations contained in the Information filed on July 15, 2005 in *United States v. William*
13 *Paranteau*, CR05-0275RSM.

14 2. The defendant real property is located in Clark County, State of Washington,
15 and is more particularly described as follows:

16 The South 680 feet of the North 964.90 feet to the East half
17 of the Northwest quarter of Section 28, Township 2 North,
Range 4 East, Willamette Meridian, Clark County,
Washington

18 PARCEL NUMBER: 141800-000

19 The defendant real property was acquired by Tamra Paranteau in March, 2003.

20 3. The parties hereby stipulate and agree that it is in the best interest of all
21 the parties for the property to be sold in an interlocutory sale to avoid economic waste, to
22 pay off the deed of trust beneficiary and to deposit the remaining funds after deduction of
23 the costs of the sale, to be held as a substitute res during the pendency of the civil
24 forfeiture litigation.

25 4. The purchase price of the defendant real property will be a cash price.

26 5. The parties agree that the net proceeds from the sale of the defendant real
27 property will include all money realized from the sale of the defendant property, except
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STIPULATION FOR THE INTERLOCUTORY SALE OF
1507 NE 341st AVENUE, WASHOUGAL, WASHINGTON-2
(C05-0171C)

the following, which, upon closing of the sale, are to be disbursed as follows:

- a) real estate commissions, if any, and any other costs associated with the marketing and sale of the defendant real property;
- b) The amounts due the lienholder, Countrywide Home Loans, pursuant to its promissory note and deed of trust. Stewart Title, the escrow agent, will submit to the United States at the time of closing, an itemized statement of all funds due to pay in full on the note and deed of trust.
- c) Amounts due the holder of any other valid liens which were recorded prior the time plaintiff's notice of *Lis Pendens* was recorded, including
 - i) Real estate property taxes which are due and owing;
 - ii) Insurance costs, if any, paid by the lienholder, Countrywide Home Loans;
- d) Escrow fees;
- e) Document recording fees not paid by the buyer;
- f) Title fees; and
- g) County transfer taxes.

9. The balance of the sale proceeds, including the earnest money payment and down payment, will be paid by the escrow agent to the United States in the form of a check issued to the United States Marshals Service to be deposited in the United States Marshal's Service Seized Asset Deposit Fund pending the conclusion of the forfeiture proceedings and further order of the Court.

10. Plaintiff and Claimants Tamra Paranteau and William Paranteau hereby agree to substitute the net sales proceeds realized from the sale of the defendant property as a "substitute *res*" for the defendant real property in this lawsuit, and as substitute property in any related criminal case. The Court shall retain jurisdiction over the net

1 sales proceeds until the conclusion of the forfeiture proceedings.

2 11. Claimants Tamra Paranteau and William Paranteau agree to forfeit all of
3 the net sales proceeds except for the sum of \$10,000 which will be returned to Claimant
4 Tamra Paranteau through her attorney after William Paranteau enters his guilty plea in
5 criminal case number CR05-0275RSM.

6 12. The claimants further agree to the entry of a Consent Judgment of
7 Forfeiture, forfeiting the remaining net proceeds of the sale of the Washougal property
8 and the net proceeds of the interlocutory sale of the defendant real property located at
9 4640 Mosquito Lake Road, Deming, Washington, as set forth in the plea agreement of
10 William Paranteau in case no. CR05-0275RSM. In addition, also consistent with the plea
11 agreement, the United States agrees that after William Paranteau is sentenced the United
12 States will dismiss this action with respect to the real property identified as Tax Parcels #
13 370503 200310 0000 and 370503 152300 0000 at Mosquito Lake Road, Deming,
14 Washington.

15 13. Petitioners Tamra Paranteau and William Paranteau agree to release and
16 hold harmless the United States, the United States Department of Justice, the Drug
17 Enforcement Administration, and any agents, servants, and employees of the United
18 States acting in their individual or official capacities, from any and all claims by Tamra
19 Paranteau and William Paranteau and their agents which currently exist or which may
20 arise as a result of the United States' forfeiture action against the above listed real
21 property, and seizure and forfeiture of the above-listed real property.

22 14. Petitioner Tamra Paranteau and William Paranteau understand and agree
23 that by entering into this Stipulated for Interlocutory Sale they waive any rights to further
24 litigate against the United States their interest in the above-listed real properties.

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STIPULATION FOR THE INTERLOCUTORY SALE OF
1507 NE 341st AVENUE, WASHOUGAL, WASHINGTON-4
(C05-0171C)

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DATED this _____ day of _____, 2005.

Respectfully submitted,

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/s/ Tamra L. Paranteau
TAMRA L. PARANTEAU
Claimant

STIPULATION FOR THE INTERLOCUTORY SALE OF
1507 NE 341ST AVENUE, WASHOUGAL, WASHINGTON-5
(C05-0171C)

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SEATTLE, WASHINGTON 98101-1271
(206) 553-7970

ORDER

This Stipulation for Interlocutory Sale is hereby approved.

DATED this 26th day of July, 2005.


UNITED STATES DISTRICT JUDGE

STIPULATION FOR THE INTERLOCUTORY SALE OF
1507 NE 341st AVENUE, WASHOUGAL, WASHINGTON-6
(C05-0171C)

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